

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

Case No. 1:19-cv-01711

RIVER NORTH EQUITY LLC,
EDWARD M. LICEAGA,
MICHAEL A. CHAVEZ,
NANOTECH ENTERTAINMENT, INC.,
NANOTECH GAMING, INC.,
DAVID R. FOLEY, LISA L. FOLEY,
JEFFREY A. FOLEY, and
BENNIE L. BLANKENSHIP,

Defendants,

MICHAEL A. CHAVEZ’S MOTION TO DISMISS PLAINTIFF’S CLAIMS

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant Michael Chavez (“Chavez”), by his attorneys, hereby moves to dismiss the claims Plaintiff Securities and Exchange Commission has asserted against him in its Complaint (Dkt. No. 1) for failure to state a claim upon which relief can be granted. The grounds for this Motion are set forth in Chavez’s accompanying memorandum. Plaintiff objects to this Motion.

Dated: May 13, 2019

Respectfully submitted,

By: /s/ Matt Hiller
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Attorneys for Defendant Michael Chavez

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Michael A. Chavez's Motion to Dismiss Plaintiff's Claims and supporting materials was filed on May 13, 2019 with the Clerk of the Court using the CM/ECF system, which will send a notice of filing to all attorneys of record.

/s/ Matt Hiller
Richard Matthew Hiller